

# ATTACHMENT 12

7/24/2024

In re: Da Vinci Surgical Robot Antitrust Litigation

Einer Elhauge

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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IN RE: DA VINCI SURGICAL ROBOT : Lead Case No.  
ANTITRUST LITIGATION : 3:21-cv-03825-VC

-----X

Deposition of EINER ELHAUGE

Conducted Remotely

Wednesday, July 24, 2024

10:02 a.m.

Reported by: Matthew Goldstein, RMR, CRR

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DIGITAL EVIDENCE GROUP  
1730 M Street, NW, Suite 812  
Washington, D.C. 20036  
(202) 232-0646

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1 Deposition of EINER ELHAUGE, conducted

2 remotely:

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9 Pursuant to Notice, before Matthew Goldstein,

10 RMR, CRR, Notary Public in and for the State of

11 Maryland.

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A P P E A R A N C E S

2

ON BEHALF OF THE PLAINTIFFS, LARKIN COMMUNITY

3

HOSPITAL, KALEIDA HEALTH AND THE PROPOSED

4

CLASS:

5

JOSHUA D. SNYDER, ESQUIRE

6

BONI, ZACK & SNYDER LLC

7

15 St. Asaphs Road

8

Bala Cynwyd, Pennsylvania 19004

9

610.822.0200

10

11

and

12

13

JEFFREY J. CORRIGAN, ESQUIRE

14

SPECTOR ROSEMAN & KODROFF, P.C.

15

2001 Market Street

16

Suite 3420

17

Philadelphia, Pennsylvania 19103

18

215.496.0300

19

20

21

22

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1 A P P E A R A N C E S C O N T I N U E D

2 ON BEHALF OF THE PLAINTIFFS, FRANCISCAN

3 ALLIANCE, INC. AND KING COUNTY PUBLIC

4 HOSPITAL DISTRICT NO. 1 (DBA VALLEY MEDICAL

5 CENTER) AND THE PROPOSED CLASS:

6 CHRISTOPHER J. BATEMAN, ESQUIRE

7 COHEN MILSTEIN SELLERS & TOLL, PLLC

8 88 Pine Street

9 14th Floor

10 New York, New York 10005

11 212.838.7797

12

13 and

14

15 DANIEL MCCUAIG, ESQUIRE

16 COHEN MILSTEIN SELLERS & TOLL, PLLC

17 1100 New York Avenue, N.W.

18 Suite 500, West Tower

19 Washington, D.C. 20005

20 202.408.4600

21

22

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1 A P P E A R A N C E S C O N T I N U E D

2 ON BEHALF OF THE DEFENDANT, INTUITIVE

3 SURGICAL:

4 ASHLEY E. BASS, ESQUIRE

5 PAUL STRAUCH, ESQUIRE

6 COVINGTON & BURLING, LLP

7 850 Tenth Street, NW

8 One City Center

9 Washington, D.C. 20001

10 202.662.5109

11

12 and

13

14 ON BEHALF OF THE DEFENDANT, INTUITIVE

15 SURGICAL:

16 WILLIAM B. MICHAEL, ESQUIRE

17 DANIEL A. CRANE, ESQUIRE

18 PAUL WEISS

19 1285 Avenue of the Americas

20 New York, New York 10019

21 212.373.3648

22

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1 A P P E A R A N C E S C O N T I N U E D

2

3 and

4

5 PAUL D. BRACHMAN, ESQUIRE

6 PAUL WEISS

7 2001 K Street, NW

8 Washington, D.C. 20006

9 202.223.7440

10

11 ALSO PRESENT:

12 JOSHUA P. DAVIS

13 JOE CERDA - VIDEOGRAPHER

14

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1           A.    Well, I don't ultimately offer a  
2    conclusion on that. My conclusion, I guess, is  
3    the evidence is capable of showing that. And so,  
4    thus, I model the scenarios in which the  
5    factfinder would so conclude and show what the  
6    damages would be and what the effect would be on  
7    common impact.

8           Q.    In the but-for world, you conclude that  
9    service pricing would be at least 12 percent less;  
10   correct?

11          A.    Yes.

12          Q.    In the but-for world, you conclude that  
13   Intuitive would still have monopoly power in your  
14   defined relevant market; correct?

15          A.    Yes. Well, in all three, I guess.  
16   There's three relevant markets. They have  
17   monopoly power in all three.

18          Q.    What three relevant markets are you  
19   referencing?

20          A.    The market for MIST surgery robots, the  
21   market for EndoWrist repair and replacement, and  
22   the da Vinci service market.



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1 Q. In the but-for world, it's your  
2 conclusion that Intuitive would have monopoly  
3 power in each of those three relevant markets?

4 A. Yes.

5 Q. In the but-for world, are you making any  
6 conclusions about what rival robotic surgical  
7 offerings would be available?

8 MR. SNYDER: Objection to form.

9 THE WITNESS: Well, I think it would  
10 include the same ones that exist in the actual  
11 world.

12 BY MS. BASS:

13 Q. In the actual world in the U.S., you  
14 note in your report that that included two rival  
15 brands for minimally invasive soft tissue surgical  
16 robots, the Senhance, S-E-N-H-A-N-C-E, and the  
17 Flex; correct?

18 A. Correct.

19 MR. SNYDER: Objection.

20 BY MS. BASS:

21 Q. So it's your conclusion that the  
22 Senhance and the Flex would still be available in

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1 the but-for world, correct?

2 A. Yes, I don't see any reason to think  
3 they wouldn't be.

4 Q. Are you reaching any conclusions  
5 regarding whether the competitive impact of the  
6 Senhance on Intuitive would change at all in the  
7 but-for world?

8 A. Can you state that again?

9 Q. Sure, I'll restate it. Maybe that will  
10 help.

11 So as part of your class certification  
12 report, are you offering any conclusions as to  
13 whether the competitive impact of the Senhance  
14 would change in the but-for world on Intuitive?

15 A. No, I'm not offering a conclusion that  
16 the competitive impact of Senhance would change in  
17 the but-for world.

18 Q. And, similarly, are you offering a  
19 conclusion that the competitive impacts on the  
20 Flex would change in the but-for world on  
21 Intuitive?

22 A. No.

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1 Q. And in your report, you detail evidence  
2 that customers found the da Vinci to be far more  
3 attractive than the Senhance or the Flex; correct?

4 MR. SNYDER: Objection.

5 THE WITNESS: Say that again.

6 BY MS. BASS:

7 Q. In your report, you detail evidence that  
8 customers found the da Vinci to be far more  
9 attractive than the Senhance or the Flex; correct?

10 A. Yes.

11 MR. SNYDER: Same objection.

12 BY MS. BASS:

13 Q. You even noted evidence that some  
14 surgeons had referred to the Senhance as a piece  
15 of junk; correct?

16 A. I recall that as to one of the two.  
17 Like, sitting here, I can't remember whether it  
18 was the Flex or the Senhance.

19 Q. You conclude in your class certification  
20 report that these rival robots were missing many  
21 of the capabilities of the da Vinci robot;  
22 correct?

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1           A.     Yeah, at least some of them are missing  
2     some capabilities.

3           Q.     In the but-for world, are you reaching  
4     any conclusions as to whether Intuitive would  
5     behave as a rational economic actor?

6           MR. SNYDER:   Objection.

7           THE WITNESS:   I assume that it would  
8     behave as a rational economic model in the but-for  
9     world.

10          BY MS. BASS:

11          Q.     In the but-for world -- Mr. Elhauge, in  
12     your report, you note that the da Vinci is a  
13     must-have product with 100 percent penetration  
14     among leading hospitals; correct?

15          A.     Yes.

16          Q.     Are you assuming -- well, start over.

17                  Are you drawing the conclusion that that  
18     same -- that same conclusion would apply in the  
19     but-for world; in other words, the da Vinci would  
20     be a must-have product with 100 percent  
21     penetration among leading hospitals?

22          A.     Yes, I think that would continue to be

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1 true in the but-for world.

2 Q. In the but-for world, is it your opinion  
3 that M-I-S-Ts, so MIST surgical robots would  
4 continue to have powerful, functional advantages  
5 over traditional surgical technologies?

6 MR. SNYDER: Objection.

7 THE WITNESS: Yes.

8 BY MS. BASS:

9 Q. In the but-for world, do you conclude  
10 that hospitals would treat traditional surgical  
11 techniques as not able to replace MIST surgery  
12 robots?

13 A. I think enough hospitals would view them  
14 as not an adequate substitute, that it would  
15 continue to be a separate relevant market.

16 Q. In your report, you note that MIST  
17 surgery robots can attract patients and increase  
18 revenues; correct?

19 A. Yes.

20 Q. The same conclusion would apply in the  
21 but-for world; correct?

22 A. Yes.

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1 to speak fast.

2 "In his damages analysis, Dr. Smith also  
3 repeats his baseless claims that (1) if EndoWrist  
4 repair or da Vinci service prices were reduced in  
5 the but-for world, Intuitive might have  
6 compensated by raising its robot prices; and (2)  
7 that might have responded to the entry of rivals  
8 into the EndoWrist repair market by raising new  
9 EndoWrist prices, either which he argues would  
10 have resulted in 'negative' damages."

11 Do you see that?

12 A. Yes.

13 Q. And that's paragraph 846. And then  
14 under that there's some subbullets of Sections a  
15 and b.

16 Do you see that?

17 A. Yes.

18 Q. So for the points that you were just  
19 making for your belief that Intuitive would not  
20 have raised the prices on robots in the but-for  
21 world, it may have reduced the prices, if  
22 anything, does paragraph 846 and subsections a and

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1 b, does that summarize your support for your  
2 conclusion?

3 A. It has some of the evidence for my  
4 conclusion, but I also have a whole section  
5 explaining why the Single Monopoly Profit Theory  
6 doesn't apply as a matter of theory. And I have a  
7 concluding section in paragraph 8 [sic] that  
8 directly discusses the possibility that robot  
9 prices might increase, and I explained why that  
10 would not occur.

11 Q. Just to make sure I got that, so in  
12 your -- you have a portion of your report that  
13 discusses a Single Monopoly Profit Theory, and  
14 that's where you discuss these issues as a matter  
15 of theory; correct?

16 A. Yes, I discuss them as a matter of  
17 theory, at least there, probably in other  
18 sections, as well. But that's a section dedicated  
19 to the theoretical question about whether reduce  
20 prices for a tied product -- and tied products  
21 here would be offset by increased prices for the  
22 tying product.

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1 And I detail the various reasons why  
2 such a premise wouldn't hold in this case. And  
3 the deviations there suggest that, if anything,  
4 robot prices would go down in the but-for world,  
5 consistent with that empirical evidence that I  
6 summarized in paragraph 846.

7 Q. And I think in your prior answer you may  
8 have also referenced -- you said paragraph 8, but  
9 I think perhaps you meant Section VIII?

10 A. Yes, I meant Part VIII.

11 Q. Apologies, Part VIII; correct?

12 A. Yes.

13 Q. So let's start by looking at what's in  
14 paragraph 846a.

15 Here it says, "I showed that his" -- and  
16 you're referring to Dr. Smith.

17 I showed that his first claim conflicts  
18 with his own data, which indicates that:

19 (i) when, in response to competitive pressure,  
20 Intuitive lowered per-use X/Xi EndoWrist prices  
21 from 2020 to 2021, it did not raise Xi robot  
22 prices, but rather lowered them.



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1 Do you see that sentence?

2 A. Yes.

3 Q. So for this description, my  
4 understanding is that you are referencing the  
5 charts in Dr. Smith's report that you refer to in  
6 Footnote 1916; is that correct?

7 A. Yes, that's part of the evidence that  
8 I'm citing.

9 Q. So I'm trying to understand what the  
10 empirical evidence is that supports each of the  
11 points in paragraph 846. So for this point where  
12 you say in response to competitive pressure,  
13 Intuitive lowered per use X/Xi EndoWrist prices  
14 from 2020 to 2021, it did not raise Xi robot  
15 prices, but rather lowered them.

16 Other than Dr. Smith's figures that you  
17 cite in the footnote, is there any other empirical  
18 evidence that supports that point?

19 MR. SNYDER: Objection.

20 BY MS. BASS:

21 Q. That you're relying upon.

22 A. Well, whatever is also cited in

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1 Sections II.C.2.iv and Section VI.B.5. So I --  
2 and I'm not sure I can remember everything in  
3 there, but it does include the empirical evidence  
4 that the extended use program did lower per-use  
5 prices for EndoWrists from 2020 to 2021, which I  
6 don't think is disputed between me and the defense  
7 expert, Dr. Smith.

8 Q. But in 846a(i), you're making the point  
9 that when Intuitive introduced its X/Xi  
10 extended-use instruments in 2020 to 2021, it did  
11 not raise Xi robot prices, but rather lowered  
12 them.

13 For the portion of that sentence that  
14 says it did not raise Xi robot prices, but rather  
15 lowered them, what are you relying upon?

16 A. For that I was relying on Dr. Smith's  
17 own data, as this paragraph says.

18 Q. Moving to the next section, ii, it says,  
19 When Intuitive was actually faced with increased  
20 competition from rivals, providing EndoWrist S/Si  
21 repair from 2018 to 2021, Intuitive reduced real  
22 prices not only for da Vinci instruments, but also

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1 was a type of robot and one of the possibilities  
2 was refurbished.

3 But then I point out in Table 20 what  
4 the actual prices were, and they're all really  
5 based upon robot type and not based on whether  
6 it's refurbished or not. And I just found some  
7 documents that confirmed that refurbished, which  
8 in the documents they call it recertified robots,  
9 were being sold at the same prices -- had the same  
10 service prices, I should say, as the service  
11 prices for non-refurbished robots.

12 Q. Okay. Were there any other documents  
13 other than those two kind of buckets that you can  
14 think of that you looked at that may not be cited  
15 in your report?

16 A. No.

17 Q. Just to clarify one of your prior  
18 answers, I asked earlier in the but-for world did  
19 you believe that Intuitive would have been a  
20 rational economic actor.

21 What's your answer to that question?

22 A. Yes. I mean, as an economist, I assume

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1 throughout that firms are rational economic  
2 actors, both in the actual world and the but-for  
3 world.

4 Q. And, also, in terms of your conclusions,  
5 so have you reached the conclusion that robot  
6 prices would have decreased in the but-for world?

7 A. Yes, I think they would have. None of  
8 my analysis depends upon that conclusion, but I  
9 conclude at least they wouldn't have increased,  
10 but that the evidence and the economic theory  
11 suggests, if anything, they would have decreased  
12 somewhat in the but-for world.

13 Q. And for your conclusion that robot  
14 prices would have decreased in the but-for world,  
15 what evidence do you believe supports that  
16 conclusion?

17 MR. SNYDER: Objection to form.

18 THE WITNESS: Well, empirically, there's  
19 all the evidence we already discussed about how,  
20 in fact, they lowered robot prices when they  
21 lowered per-use EndoWrist prices, and that cuts in  
22 prices for EndoWrists and service coincide with

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1 drops in the robot prices, the fact that they  
2 couldn't adjust for S/Si robot prices because they  
3 weren't selling new ones after 2018, and on the  
4 theory I point out that some of the assumptions  
5 that don't hold, and thinking those through, those  
6 would suggest that, if anything, they would lower  
7 prices in the but-for world.

8           And here I'm thinking about the fact  
9 that one of the assumptions doesn't hold this, we  
10 don't have a fix amount of tying market power.  
11 One reason here is that service would be a partial  
12 substitute for robots, that is the more -- you  
13 need to buyer fewer robots the more you spend on  
14 service so that the service prices go down, that  
15 will tend to suppress robot prices.

16           The other thing I point out is that  
17 there's not a fixed ratio that permits the use of  
18 ties to engage price discrimination by tying a  
19 robot to a price inflated EndoWrist or service,  
20 and that the -- whatever the optimal ratio is for  
21 price -- price ratio is for that price  
22 discrimination would indicate that if you lower

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1 one price, you should lower the robot price, as  
2 well.

3 So I guess a combination of the direct  
4 empirics on what they did in terms of robot  
5 pricing, but also the implications of the  
6 conclusions about why the Single Monopoly Profit  
7 Theory doesn't hold.

8 And I guess the last factor is there's  
9 no reason to think their market power would go up  
10 in robots in the but-for world. So they  
11 wouldn't -- there's no reason to think that they  
12 would have a higher profit maximizing price.

13 Presumably, they're already at their  
14 profit maximizing price. So there's no real  
15 factor to advising them to raise that and there  
16 are factors to decrease it and that's consistent  
17 with the empirical evidence that we see.

18 BY MS. BASS:

19 Q. I had a follow-up question for you about  
20 one thing that you said there.

21 When you said that service would be a  
22 partial substitute for robots, could you please

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1 expand on that?

2 A. Sure. So I discuss this in  
3 paragraph 680 of my report, where I say that one  
4 of the assumptions that's key for the Single  
5 Monopoly Profit Theory is that the tying market  
6 competitiveness is fixed and that if this doesn't  
7 hold, tying can create additional anticompetitive  
8 effects by making the degree of tying market power  
9 higher than it would have been without tying.

10 And this applies to this case, I say,  
11 because servicing da Vincis is a partial  
12 substitute for buying new da Vincis, in the sense  
13 that the more servicing one buys, the less one  
14 needs to buy a new da Vinci. And as a result,  
15 lowering service prices would predictably mean  
16 more servicing, longer lasting da Vincis and thus  
17 lower prices for new da Vincis.

18 So the implications of that factor not  
19 holding are that the but-for price for robots  
20 should be somewhat reduced because lower servicing  
21 prices would lower the price of a partial  
22 substitute.

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1 A. Yes.

2 Q. If you could turn to paragraph 860 of  
3 your report.

4 A. Okay.

5 Q. So here, you say that -- you define the  
6 class in paragraph 860, and you say, "with the  
7 caveat that government entities such as military  
8 or veterans' hospitals are excluded."

9 Do you see that?

10 A. Yes.

11 Q. So was it your intent in your analyses  
12 to exclude military and veterans hospitals from  
13 the class?

14 A. That's what -- yeah, that's what -- I  
15 don't know if I had my intent, but that's the  
16 definition that my staff and I use in our  
17 analysis. So we did exclude military and veterans  
18 hospitals from the customer list when we defined  
19 the class.

20 Q. Other than military or veterans  
21 hospitals, did you exclude anyone else on the  
22 basis of this government entity's exclusion in the



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1 class definition?

2 A. No, my understanding from plaintiffs'  
3 counsel is by "government entities" they meant  
4 military or veterans hospitals.

5 Q. So the -- basically, the plaintiffs'  
6 counsel instructed you that "government entities"  
7 meant military or veterans hospitals, and you took  
8 that instruction and only based your analyses off  
9 of excluding military and veterans hospitals; is  
10 that correct?

11 A. Yes, I'm relying on their definition of  
12 the class.

13 Q. So earlier we started talking a little  
14 bit about tied and tying products. So just so  
15 that the record is clear here, what are the tied  
16 products in this case?

17 A. The tied products are the EndoWrist, the  
18 market for EndoWrist replacement and repair, and  
19 the market for da Vinci service are both tied  
20 markets.

21 Q. And what is the tying product here?

22 A. The da Vinci product, I guess the tying

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1 necessarily lower that price. And there's other  
2 factors that bear here. As I point out, part of  
3 the tie here is to a partial substitute. And if  
4 you tie to a partial substitute, then inflate its  
5 price, you're going to increase pricing on the  
6 tied product market, not decrease it, for reasons  
7 that I explain in my report.

8           And I think to the extent you're price  
9 discriminating, if -- in the but-for world, we  
10 have to take into account that they wouldn't be  
11 able to inflate the price of EndoWrists. And,  
12 thus, to maintain the right ratio of prices to  
13 optimize their price discrimination, that would  
14 give them incentives to lower the monopoly price  
15 on the robots rather than increase it in the  
16 but-for world.

17           So for all those reasons, those are all  
18 the theoretical reasons related to the literature  
19 that I mentioned. And, of course, there's this  
20 empirical evidence here that, in fact, they charge  
21 very high prices for robots, extraordinarily high,  
22 and that they -- to the extent that there was

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1 BY MS. BASS:

2 Q. Okay. So let's take it out of the  
3 article then.

4 Just from your perspective, if you have  
5 reached the conclusion that a tie has a negative  
6 impact on consumer welfare, do you think that that  
7 conclusion would necessarily answer the question  
8 of whether or not the tie had a net economic  
9 impact on all of the entities that were subject to  
10 the tie?

11 MR. SNYDER: Objection.

12 THE WITNESS: I think I need to know  
13 more about the hypothetical, but I don't think  
14 it -- as I sit here today, I don't think it  
15 uniformly follows from the fact that ties can harm  
16 consumer welfare, that they necessarily harm all  
17 consumers. That alone -- in this case, that  
18 effect follows, but in the abstract, I think maybe  
19 one could imagine scenarios where some consumers  
20 wouldn't be harmed even though consumers overall  
21 are harmed.

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1 increase the robot price, not decrease it. And  
2 that's what we see with the evidence. It's  
3 consistent with the evidence. We have higher  
4 robot prices with the restraints, not lower robot  
5 prices.

6 Q. And when you were just talking about  
7 the -- that's your five-factor test; right?  
8 That's your view here, that based off of that  
9 test, that there wouldn't be any adjustment on  
10 robot prices; is that right?

11 A. The five factors are ones that disprove  
12 the Single Monopoly Profit Theory that there  
13 necessarily would be an adjustment on robot  
14 prices, that is, would make it lower in response  
15 to a higher tied product price. So that's wrong.

16 But I don't show that there's no  
17 adjustment in robot prices. Instead, what I show  
18 is the robot prices would be lower in the but-for  
19 world without the restraints; that is, that the  
20 restraints are inflating not only EndoWrists  
21 prices and service prices, but also inflating  
22 robot prices.

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1 Q. I know we covered this today, but what's  
2 your basis for saying that robot prices are  
3 inflated with the tie?

4 A. Well, there's all the empirical evidence  
5 that we have, that when they -- with the tie, when  
6 they lowered the per-use price for EndoWrists,  
7 they actually lowered the robot price. There's  
8 the fact that during the period of the alleged  
9 anticompetitive restraints, they were, in fact,  
10 lowering robot prices when they lowered EndoWrist  
11 and service prices rather than raising the robot  
12 prices.

13 There's a fact that the tying product  
14 is, you know, for the S/Si repairs is S/Si robots,  
15 and they're not selling them anymore. So they  
16 can't really adjust by -- offset any price by  
17 raising the robot -- by lowering the robot prices  
18 in those cases.

19 There's the economic theory that  
20 indicates that there's partial substitutes, which  
21 would mean that without the challenged restraints,  
22 we would expect the robot prices to be lower. And

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1     there's the fact that we're increasing -- sorry,  
2     the market power in the tied market, which would  
3     make this particular metering model inapplicable.

4           Q.     So are you aware of any economic  
5     literature about metering ties in which the  
6     monopolist isn't described as lowering the price  
7     of the capital good in order to extract a higher  
8     price on the tied products or the consumables?

9                    Could you point us to that academic  
10    literature?

11                   MR. SNYDER:  Objection to form.

12                   THE WITNESS:  I don't know -- I mean,  
13    there might be -- sometimes it is the case that  
14    they lower the price, but I don't know of any  
15    literature that indicates that that's universally  
16    what happens.  There may be people who think that  
17    happens a lot, but I don't think anything in the  
18    economic proofs proves that that happens,  
19    especially when you consider all the other  
20    anticompetitive effects of tying.

21                   MS. BASS:  We've been going about an  
22    hour.  Would it be okay to take a break?

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1 THE WITNESS: Sure.

2 MR. SNYDER: Sure. We can go off the  
3 record.

4 THE VIDEOGRAPHER: Okay. Team, stand  
5 by. We are now going off the record. The time is  
6 1:57 p.m.

7 (Recess from the record.)

8 THE VIDEOGRAPHER: We are now going back  
9 on the video record. The time is 2:18 p.m.

10 BY MS. BASS:

11 Q. So, Professor Elhauge, returning to the  
12 questions that we were just discussing before the  
13 break. So I know that you don't agree that  
14 Intuitive would have had to lower the price of its  
15 robots in order to engage in metering, but assume  
16 that contrary to your opinion, Intuitive did lower  
17 its prices of robots to engage in metering and,  
18 therefore, robot prices would have been higher in  
19 the but-for world.

20 Have you done any analysis to show what  
21 the net effect would be in the but-for world on  
22 hospitals that were less-intensive users, taking

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1 into account the higher prices for robots and the  
2 lower prices for EndoWrist?

3 MR. SNYDER: Objection to form.

4 THE WITNESS: I did not base my analysis  
5 on the premise that they would raise robot prices  
6 in a but-for world. So I didn't weigh those  
7 against each other. But, also, I think implicit  
8 in your question was that prohibiting the  
9 challenge restraints would prohibit all metering  
10 in the but-for world.

11 I don't think that follows, because it  
12 would still have power over new EndoWrists. So it  
13 would reduce their market power in the EndoWrist  
14 repair market, but it would not eliminate it or  
15 eliminate the price inflation. Because they still  
16 make the only EndoWrists that can work with the  
17 da Vinci robot. I don't think that premise quite  
18 holds either.

19 BY MS. BASS:

20 Q. So just to break that down a little bit,  
21 so I think you were agreeing that you haven't  
22 conducted an analysis of what the net effect would



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1 be in the but-for world if the robot prices would  
2 be higher; correct?

3 MR. SNYDER: Objection to form.

4 THE WITNESS: Correct, because that's  
5 not what the evidence indicates. Robot prices  
6 would not have been higher in the but-for world,  
7 so there's no trade-off to make.

8 BY MS. BASS:

9 Q. Correct. I understand you don't accept  
10 the premise of the question, but that's not an  
11 analysis that you've undertaken; correct?

12 A. Correct. Because the analysis I  
13 concluded would be irrelevant in this case.

14 Q. So then to go back to the point that you  
15 were making about the new EndoWrists, so were you  
16 saying that there would be metering in the but-for  
17 world?

18 A. I think there could be metering in the  
19 but-for world, as well, because it would still  
20 have price-inflated new EndoWrists. It would be  
21 constrained, though, by rival repair competition.

22 But to the extent there's metering now,

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1 STATE OF MARYLAND )

2 ss:

3 COUNTY OF MONTGOMERY )

4

5 I, Matthew Goldstein, Notary Public within  
6 and for the State of Maryland, do hereby certify:

7 That I reported the proceedings in the  
8 within entitled matter, and that the within  
9 transcript is a true record of said proceedings.

10 I further certify that I am not related to  
11 any of the parties to the action by blood or  
12 marriage, and that I am in no way interested in the  
13 outcome of this matter.

14 IN WITNESS WHEREOF, I have hereunto set my  
15 hand this 27th day of July, 2024.

16

17

18

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22



Matthew Goldstein, RMR, CRR